

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE NATIONAL NEWSPAPER ASSOCIATION WITNESS HEATH  
(USPS/NNA-T1-50-56)

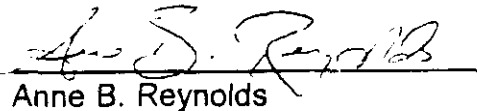
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the National Newspaper Association witness Heath: USPS/NNA-T1-50-56.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

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January 28, 1998

USPS/NNA-T1-50. At page 17, lines 11-13, you discuss mailers' difficulty in using Plant-Verified Drop Shipment.

- a. Please specify the "complex procedures" that you feel hinder mailers' use of Plant-Verified Drop Shipment.
- b. What do you understand to be the purpose(s) behind each of these procedures, and why do you consider each to be not appropriate?

USPS/NNA-T1-51. Please fully set forth your understanding of how exceptional dispatch mail is entered and verified.

USPS/NNA-T1-52. At page 18, lines 13-16, you discuss "additional headaches involved in keeping postage deposits at several offices and in filing additional mailers' statements for relatively small quantities of mail." Please explain your understanding of why a mailer would choose to undergo these steps and why the Postal Service chooses to make them available.

USPS/NNA-T1-53. For each of LNCL's publications for which such information is available, please estimate the percentage that is carrier-route presorted.


USPS/NNA-T1-54. Please identify and explain all bases underlying your statement at page 18, lines 3-4 of your testimony, that the "diversion from the usual SCF path creates a savings for the Postal Service that at least equates to avoided transportation costs." Please document fully any such quantified bases.

USPS/NNA-T1-55. At page 19, lines 18-19 of your testimony, you state that "Periodicals mail is verified only annually." Please provide all bases for this statement.

USPS/NNA-T1-56. Please refer to your Exhibit 3, on page 10 of your testimony. Are the figures in the "Total Circulation" column weekly or annual figures?

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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